Data Protection Policy and Privacy Policy

The Purpose of this Policy

This policy statement relates to all employees at Energys Group Limited (comprising of Energy Conservation Solutions Ltd, Cube Lighting & Design and Cube Solar Installations Limited).

The personal data that Energys Group processes to provide their services relates to its clients and other individuals as necessary, including employees and suppliers. This policy sets out Energys Group's commitment to ensuring that any personal data, including special category personal data, which Energys Group processes, is carried out in compliance with data protection law. Energys Group ensures that good data protection practice is imbedded in the culture of our staff and our organisation.

Energys Group's other data protection policies and procedures are:

- Record of processing activities
- Privacy notices (website, clients, employees)
- Personal data breach reporting and a breach register
- IT security policies

'Data Protection Law' includes the General Data Protection Regulation 2016/679; the UK Data Protection Act 2018 and all relevant EU and UK data protection legislation.

Scope

This policy applies to all personal data processed by Energys Group and is part of Energys Group's approach to compliance with data protection law. All Energys Group employees are expected to comply with this policy and failure to comply may lead to disciplinary action for misconduct, including dismissal.

Principles

Energys Group complies with the data protection principles set out below. When processing personal data, it ensures that:

- It is processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency')
- It is collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation')
- It is all adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation')
- It is all accurate and, where necessary, kept up to date and that reasonable steps will be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy')
- It is kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation')
- It is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality')

Data Subject Rights

Energys Group has processes in place to ensure that it can facilitate any request made by an individual to exercise their rights under data protection law as appropriate, always communicating in a concise, transparent, intelligible and easily accessible form. All employees have received training and are aware of the rights of data subjects. Employees can identify such a request and know who to send it to. All requests will be considered without undue delay and within one month of receipt, as far as possible.

Subject Access

The right to request information about how personal data is being processed, including whether personal data is being processed, and the right to be allowed access to that data and to be provided with a copy of that data along with the right to obtain the following information:

- The purpose of the processing
- The categories of personal data
- The recipients to whom data has been disclosed or which will be disclosed
- The retention period
- The right to lodge a complaint with the Information Commissioner's Office
- The source of the information if not collected direct from the subject, and
- The existence of any automated decision making

Rectification

The right to allow a data subject to rectify inaccurate personal data concerning them.

Erasure

The right to have data erased and to have confirmation of erasure, but only where:

- The data is no longer necessary in relation to the purpose for which it was collected, or
- Where consent is withdrawn, or
- Where there is no legal basis for the processing, or
- There is a legal obligation to delete data

Restriction of Processing

The right to ask for certain processing to be restricted in the following circumstances:

- If the accuracy of the personal data is being contested, or
- If our processing is unlawful but the data subject does not want it erased, or
- If the data subject has objected to the processing, pending verification of that objection

Data Portability

The right to receive a copy of personal data which has been provided by the data subject and which is processed by automated means in a format which will allow the individual to transfer the data to another data controller. This would only apply if Energys Group was processing the data using consent or on the basis of a contract.

Object to Processing

The right to object to the processing of personal data relying on the legitimate interests processing condition unless Energys Group can demonstrate compelling legitimate grounds for the processing which override the interests of the data subject.

Special Category Personal Data

This includes the following personal data revealing:

- Racial or ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- An individual's health
- A person's sexual orientation
- Criminal convictions or offences

Energys Group processes special category data of employees as is necessary to comply with employment law. This policy sets out the safeguards we believe are appropriate to ensure that we comply with the data protection principles set out above.

Responsibility for the Processing of Personal Data

The Managing Director of Energys Group takes ultimate responsibility for data protection.

If you have any concerns or wish to exercise any of your rights under the GDPR, then you can contact the data protection lead in the following ways:

Name: Kevin Cox Address: Energys Group, Suite 5, Franklyn House, Daux Road, Billingshurst, RH14 9SL Email: kevin.cox@energysgroup.com Telephone: 01403 786212

ECSL Privacy Notice

Our contact details Name: Energy Conservation Solutions Limited Address: Suite 5 Franklyn House, Daux Road, Billingshurst, RH14 9SJ Phone Number: 01403 786212 E-mail: info@energysgroup.com

What type of information we have

We currently collect and process the following information:

- Personal identifiers, contacts and characteristics (name, phone numbers and email address)
- Passport or Birth Certificate, for eligibility to work in UK checks
- Bank details, for payroll purposes
- Next of kin details, in case of emergency (accident/incident) at work involving our employees
- Personnel training records

How we get the information and why we have it

Most of the personal information we process is provided to us directly by you for one of the following reasons:

- Completion of contractual paperwork, required by employment law
- Processing of monthly payroll
- Completion of training and security checks (such as DBS)

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

(a) Your consent (Note: You are able to remove your consent at any time. You can do this by contacting Kevin Cox, Managing Director, on Kevin.Cox@energysgroup.com)

(b) We have a contractual obligation

(c) We have a legal obligation

What we do with the information we have

We use the information that you have given us in order to

- Create all contractual documentation
- Include employees in our monthly payroll
- Complete security checks for employees to attend sites (e.g. DBS & MoD clearance)

We may share this information with

- MoD clearance teams (e.g. VIVO or Mitie)
- DBS check company
- RIDDOR (for applicable reportable accidents/incidents)
- Training companies when booking relevant required staff training

How we store your information

Personnel information is securely stored on the Company cloud server, with access limited to HR, Finance Manager and company Directors. We keep employee details for the duration of their employment with ECSL and for up to 6 years after their employment has terminated. We will then dispose of this information securely once employment has terminated. This is done by deleting documentation relevant to those who have left the Company and by shredding any paper-based documentation held in personnel files.

Any information accessible after employment has ceased is kept for statutory purposes:

- To cover the time limit for bringing any civil legal action
- Income tax, NI & HMRC correspondence kept for no less than 3 years as per Income Tax (Employments) Regulations
- Payroll salary records, including overtime, bonuses & expenses
- Accounting records kept for 3 years, for private companies
- Working time records, including overtime, annual holiday, time off etc kept for 2 years from the date on which they were made
- Keeping accident/incident details for 3 years from the date of entry
- RIDDOR reportable injuries
- Information relating to the Covid job retention scheme (furlough payments) relating to the employee, to be kept for up to 6 years for HMRC
- First aid and fire warden training details kept for up to 6 years as per H&S (First Aid) Regulations and Fire Precautions (Workplace) Regulations
- Health & Safety training details kept for 5 years after employment as per H&S Regulations
- Records relating to COSHH kept for 5 years from date of testing
- Statutory pay records kept for 3 years from the end of the tax year in which the payment period ends; including maternity leave, parental leave and SSP
- Whistleblowing documents kept for 6 months following the outcome (if substantiated)

Your data protection rights

Under data protection law, you have rights including:

- Your right of access - You have the right to ask us for copies of your personal information
- Your right to rectification - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete
- Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances
- Your right to restriction of processing - You have the right to ask us to restrict the processing of your information in certain circumstances
- Your right to object to processing - You have the the right to object to the processing of your personal data in certain circumstances
- Your right to data portability - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact Kevin Cox, Managing Director if you wish to make a request: Email: Kevin.Cox@energysgroup.com Phone: 01403 786212 Address: Suite 5 Franklyn House, Daux Road, Billingshurst, RH14 9SJ

How to complain

You can also complain to the ICO if you are unhappy with how your data has been used.

The ICO's address: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF Helpline number: 0303 123 1113

Data Protection Governance and ESG Commitments

This section gives effect to the governance commitments in the Energys Group ESG Strategy and Policy Suite and applies to all personal data processed by Energys Group including data collected through connected products and client energy dashboards.

Legal and regulatory context

- UK GDPR and the Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR)
- ICO registration (held)

Commitments

We will:

- Maintain our ICO registration.
- Identify and document a lawful basis for all personal data processing, apply data minimisation, and follow defined retention schedules.
- Respond to subject access requests within the statutory one-month timeframe.
- Maintain a documented data breach response process, including assessment of the 72-hour ICO notification duty where a breach is reportable.
- Apply data protection by design when specifying or developing connected products.
- Put data processing agreements in place with third-party software and cloud vendors before sharing personal data with them.

Procedures, monitoring and review

Any suspected data breach is reported immediately to the Data Protection Lead, who assesses severity and, where the statutory threshold is met, notifies the ICO within 72 hours. Data processing agreements are reviewed as part of new vendor onboarding. We track subject access request response compliance and breach notification compliance, and this policy is reviewed annually, or sooner following any material security incident.



Signed: _____ Date: 1st November 2026

Kevin Cox
Managing Director
On behalf of Energys Group